

Exhibit A

Proposed Order

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

_____)	
In re:)	
)	PROMESA
THE FINANCIAL OVERSIGHT AND)	Title III
MANAGEMENT BOARD FOR PUERTO RICO,)	
)	Case No. 3:17-bk-03283 (LTS)
as representative of)	
)	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,)	
)	
Debtors.)	
_____)	
	X	
In re:)	
)	
THE FINANCIAL OVERSIGHT AND)	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,)	Title III
)	
as representative of)	Case No. 3:17-cv-01685 (LTS)
)	Case No. 3:17-bk-03566 (LTS)
)	
THE EMPLOYEES RETIREMENT SYSTEM OF THE)	
GOVERNMENT OF THE COMMONWEALTH OF)	
PUERTO RICO,)	
)	
Debtor.)	
-----)	
	X	

**[PROPOSED] ORDER GRANTING MOTION OF
ANDALUSIAN GLOBAL DESIGNATED ACTIVITY COMPANY,
MASON CAPITAL MASTER FUND, LP, AND THE PUERTO RICO FUNDS
FOR A PROTECTIVE ORDER**

Upon consideration of the *Motion of Andalusian Global Designated Activity Company, Mason Capital Master Fund, LP, and the Puerto Rico Funds for a Protective Order* (the “Motion”),¹ the Court having reviewed the Motion and the relief requested; the Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1331 and 48 U.S.C. § 2166(a); the Court determining that venue of this proceeding and the Motion in this District is proper under 28 U.S.C. § 1391(b) and 48 U.S.C. § 2167(a); notice of the Motion being adequate and proper under the circumstances; and after due deliberation and sufficient cause appearing; therefore, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.
2. Movants shall not be required to designate a witness to testify about Topics 1–13, Topics 15–21, Topic 23, or about Topic 14 with respect to the dates before the imposition of the automatic stay, from the Notice of Rule 30(b)(6) Depositions of Andalusian Global Designated Activity Company, Mason Capital Master Fund, LP, and the Puerto Rico Funds.
3. The Oversight Board shall not be entitled to inquire about the Topics 1–13, Topics 15–21, Topic 23, or about Topic 14 with respect to the dates before the imposition of the automatic stay, from the Notice of Rule 30(b)(6) Depositions of Andalusian Global Designated Activity Company, Mason Capital Master Fund, LP, and the Puerto Rico Funds, during the individual depositions of James Bolin, Richard Engman, and Leslie Highley, Jr.
4. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this order.

Dated: _____
Boston, Massachusetts

UNITED STATES MAGISTRATE JUDGE

¹ Capitalized terms used but not otherwise defined herein will have the meaning as set forth in the Motion.